

## REMARKS

Claims 1- 18 are now pending in this application. The Applicant has amended claims 1-6, 9-15 and 18. Applicant submits that the application is now in condition for allowance. Reconsideration and allowance of claims 1-18 now pending in this application is respectfully requested in view of the following.

A. Rejection under 35 U.S.C. § 101

The Examiner rejected claims 1-9 as being directed to non-statutory subject matter. Specifically, the Examiner states the claims 1-9 are directed to an abstract idea that is not tied to a technological art or machine that would result in a practical application producing a concrete, useful, and tangible result. The Applicant has amended claim 1 as suggested by the Examiner. The Applicant believes that the rejection has been overcome, and thus, requests withdrawal of the rejection.

B. Rejection under 35 U.S.C. 103

Claims 1-8, and 10-17 have been rejected under 35 U.S.C. 103 as being unpatentable over Dave Raggett, "Clean up your Web Pages with HTML Tidy," 4<sup>th</sup> version (August 2000), pgs 1-21 ("HTML Tidy") in view of Douglass et al. U.S. Patent Application Publication No. 2004/0260676 ("Douglass").

Claims 1 and 10, as amended, now recites converting an original structured document that is either a SGML document or a XML document, identifying each first level element in the original structured document and generating a first level XHTML content fragment corresponding to each first level element. The present invention converts a structured document independent of the application that created the structured document. The method parses a structured document, such as SGML and XML, to convert the structured document on an element by element basis. For each element identified control is passed to an element handler established for that identified element. Each element handler performs the function of parsing the element for which it was established and generates a corresponding XHTML content fragment.

HTML Tidy is an application used to correct mistakes in a revised or converted HTML document, where the mistakes were generated by the editing a HTML or converting a HTML document with a conversion tool. See HTML Tidy, Introduction pg. 2. HTML Tidy fails to teach converting an original structured document that is either a SGML document or a XML document as claimed in claims 1 and 10. In addition, HTML Tidy fails to teach parsing the original structured document to identify each element in the structured document. HTML Tidy merely identifies problem elements in the HTML code of a revised or converted document. This is far different than identifying each element in a structured document regardless of whether it generates a problem or not. Lastly, HTML Tidy fails to generate a first level XHTML content fragment corresponding to each first level element. As previously stated, HTML Tidy merely identifies problem elements accordingly, it only maps the problem element to HTML elements. There is no identification of one element of the type for the structured document to an HTML element. Accordingly, HTML Tidy fails to teach or suggest the invention of claims 1 and 10.

Douglis does not cure the deficiencies of HTML Tidy. Douglis merely teaches detecting fragments in a document and storing of the fragments. Accordingly, HTML Tidy and Douglis, alone or in combination, fails to teach the invention of claim 1 and 10.

Claim 2-8 and 11- 17 depend from claims 1 and 10 respectively. Accordingly, claim 2-8 and 11-17 are not taught for at least the same reasons discussed above with respect to claims 1 and 10.

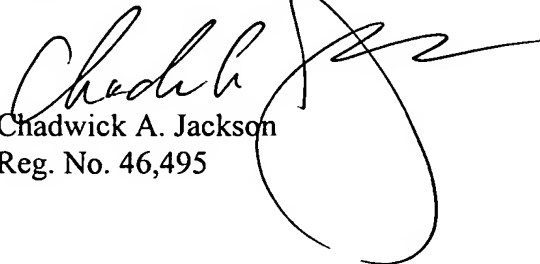
Claims 9 and 18 have been rejected under 35 U.S.C. 103 as being unpatentable over Dave Raggett, "Clean up your Web Pages with HTML Tidy," 4<sup>th</sup> version (August 2000), pgs 1-21 ("HTML Tidy") in view of Douglis et al. U.S. Patent Application Publication No. 2004/0260676 ("Douglis") and in further view of Fong et al. U.S. Patent Application Publication No. 2005/0166141 (Fong).

Fong does not cure the deficiencies of HTML Tidy and Douglis. Accordingly, HTML Tidy, Douglis, and Fong, alone or in combination does not teach the invention of claims 1 and 10 and thus does not teach the invention of claims 9 and 18.

## CONCLUSION

No other fees are believed to be due at this time. Should any fee be required, however, please charge such fees to Bingham McCutchen LLP Deposit Account No. 19-5127 (order no. 19111.0115).

Respectfully Submitted,



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